

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE LIBOR-BASED FINANCIAL
INSTRUMENTS ANTITRUST LITIGATION

)
)
) MDL No. 2262
)

THIS DOCUMENT RELATES TO:

) Master File No. 1:11-md-2262-NRB
)

THE BERKSHIRE BANK and GOVERNMENT
DEVELOPMENT BANK FOR PUERTO RICO,
Individually and On Behalf of All Others
Similarly Situated,

) ECF Case
)
)

Plaintiffs,

) Civil Action No. 12-CV-5723-NRB
)

v.

BANK OF AMERICA CORPORATION; BANK
OF AMERICA, N.A.; BANK OF TOKYO
MITSUBISHI UFJ LTD.; BARCLAYS BANK
PLC; CITIGROUP, INC.; CITIBANK, N.A.;
COÖPERATIEVE CENTRALE
RAIFFEISENBOERENLEENBANK
B.A.; CREDIT SUISSE GROUP AG; DEUTSCHE
BANK AG; HSBC HOLDINGS PLC; HSBC
BANK PLC; JPMORGAN CHASE & CO.;
JPMORGAN CHASE BANK, NATIONAL
ASSOCIATION; LLOYDS BANKING GROUP
PLC; HBOS PLC; ROYAL BANK OF CANADA;
THE NORINCHUKIN BANK; THE ROYAL
BANK OF SCOTLAND GROUP PLC; UBS AG;
WESTLB AG; and WESTDEUTSCHE
IMMOBILIENBANK AG,

Defendants.

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DIRECTORS FINANCIAL GROUP,)	
Individually and On Behalf of All Others)	
Similarly Situated,)	
)	
Plaintiff,)	No. 13 Civ. 1016
v.)	
BANK OF AMERICA CORPORATION; BANK)	
OF AMERICA, N.A.; BANK OF TOKYO)	
MITSUBISHI UFJ LTD.; BARCLAYS BANK)	
PLC; CITIGROUP, INC.; CITIBANK, N.A.;)	
COÖPERATIEVE CENTRALE)	
RAIFFEISENBOERENLEENBANK)	
B.A.; CREDIT SUISSE GROUP AG; DEUTSCHE)	
BANK AG; HSBC HOLDINGS PLC; HSBC)	
BANK PLC; JPMORGAN CHASE & CO.;)	
JPMORGAN CHASE BANK, NATIONAL)	
ASSOCIATION; LLOYDS BANKING GROUP)	
PLC; HBOS PLC; ROYAL BANK OF CANADA;)	
THE NORINCHUKIN BANK; THE ROYAL)	
BANK OF SCOTLAND GROUP PLC; UBS AG;)	
WESTLB AG; and WESTDEUTSCHE)	
IMMOBILIENBANKAG,)	
)	
Defendants.)	
)	
)	
)	

**DECLARATION OF JEREMY A. LIEBERMAN IN SUPPORT OF
MOTION FOR APPOINTMENT OF INTERIM CLASS COUNSEL AND
CONSOLIDATION OF ALL RELATED CASES**

I, Jeremy A. Lieberman, declare:

1. I am an attorney with the law firm of Pomerantz LLP, counsel for Berkshire Bank, Government Development Bank for Puerto Rico, and Directors Financial Group (the “Lender Class Plaintiffs”). I make this Declaration in support of the motion for appointment of Interim Class Counsel and consolidation of all related cases.

3. Attached hereto as Exhibit A is a true and correct copy of the firm resume for Pomerantz LLP.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct.

Executed this 15th day of September, 2014, in New York, New York.

/s/Jeremy A. Lieberman

Jeremy A. Lieberman